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ON-SCENE COORDINATOR'S REPORT
COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT
REMOVAL ACTION AT THE
76th AND PARNELL SITE
CHICAGO, COOK COUNTY, ILLINOIS
SITE ID: B55X

VOLUME 1 OF 2

Prepared for

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V Emergency Response Branch
77 West Jackson Boulevard
Chicago, Illinois 60604

Prepared by

WESTON SOLUTIONS, INC.
3 First National Plaza
70 West Madison Street, Suite 1990
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Date Prepared	19 June 2003
TDD Number	S05-0303-007
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Contract Number	68-W-00-119
START Project Manager	Richard H. Mehl, Jr.
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U.S. EPA On-Scene Coordinator	Michael Harris

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Richard H. Mehl, Jr., START Project Manager

Reviewed and
Approved by: Richard H. Mehl Date: 6/19/03
for Pamela Bayles, START Program Manager

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

DATE: 19 June 2003

SUBJECT: ON-SCENE COORDINATOR'S REPORT - CERCLA Removal Action at the 76th and Parnell Site, Chicago, Cook County, Illinois, Site ID# B55X

FROM: Michael Harris, On-Scene Coordinator
Emergency Response Branch

TO: Margaret Guerriero, Acting Chief
Emergency Response Branch

THROUGH: Bill Bowen, Chief Section 2
Division of Superfund

Please find attached the United States Environmental Protection Agency (U.S. EPA) On-Scene Coordinator's (OSC's) Report for the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) removal action conducted at the 76th and Parnell Site, in Chicago, Cook County, Illinois. The report follows the format outlined in the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), Section 300.165. The removal was initiated on 10 March 2003, and was completed on 25 April 2003. The OSC for this removal action was Mr. Michael Harris.

U.S. EPA took action to mitigate threats posed by uncontrolled hazardous levels of lead present within soil at and near the surface of the site. This uncontrolled hazardous substance posed an immediate threat to public health and the environment. The specific cause for the release of the hazardous substance at the site could not be determined, but is related to the site's history of industrial use.

Costs under control of the OSC are estimated at $323,171.05 of which $33,171.05 was attributable to the Superfund Technical Assessment and Response Team (START) contractor as of 25 April 2003; $290,00.00 was attributable to the Emergency and Rapid Response Services (ERRS) contractor as of 25 April 2003. Additional costs incurred by state and local agencies are not included in this report.

In this OSC Report, any indication of specific costs incurred at the site is only an approximation, subject to audit and final definitization by U.S. EPA. The OSC report is not a final reconciliation of the costs associated with this site.

Portions of the OSC Report Appendices may contain confidential business or enforcement-sensitive information and must be reviewed by the Office of Regional Counsel prior to release to the public. The 76th and Parnell Site is not on the National Priorities List.

ON-SCENE COORDINATOR'S REPORT
COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT
REMOVAL ACTION AT THE
76th AND PARNELL SITE
CHICAGO, COOK COUNTY, ILLINOIS
SITE ID: B55X
NPL STATUS: NON-NPL
TDD: S05-0303-007

Removal Dates: 10 March 2003 to 25 April 2003

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V
Division of Superfund
Emergency Response Branch

TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

LIST OF ATTACHMENTS

Emergency Response Branch
Division of Superfund, U.S. EPA, Region 5

OSC REPORT STANDARD APPENDICES LIST*

Site Name: 76th and Parnell Soil Removal Site, Chicago, Cook County, Illinois
Site ID#: B55X
Task Order #: S05-0303-007

1. OPERATIONAL FILES	ID#
-Action Memos/Additional Funding Requests/Time Exemptions	1-A
-Enforcement	1-B
-Site Safety Plans/Material Safety Data Sheets	1-C
-POLREPs	1-D
-Daily Work Orders	1-E
-Air Monitoring Log	1-F
-Site Entry/Exit Log	1-G
-Hot Zone Entry/Exit Log	1-H
-Equipment/Material Log	1-I
-Equipment Tracking Sheets	1-J
-Activity Logs	1-K
-Site Log	1-L
-Site Maps	1-M
-General Correspondence/Information	1-N
-Community Relations	1-O
-Site Photos/Videos	1-P
-Other	1-Q

2. FINANCIAL FILES	ID#
-Task Order/Procurement Requests/Modifications to Contract (ERRS)	2-A
-Technical Direction Documents/Modifications (START)	2-B
-Daily Cost Reporting/U.S. EPA Form 1900-55s (ERRS)	2-C
-Daily Cost Summaries/ERRS Invoices	2-D
-Incident Obligation Log	2-E
-ERRS Invoices	2-F
-Cost Projections	2-G
-START Cost Documentation	2-H
-Subcontractor Bid Sheets	2-I
-Receipt Logs	2-J
-Await Bill Tracking Logs	2-K

OSC REPORT STANDARD APPENDICES LIST (continued)

3.	TECHNICAL FILES	ID#
	-Disposal Bids	3-D
	-Waste Manifests	3-F
	-Chains-of-Custody	3-G
	-Analytical Binder/Assessment	3-H
	-Validation Memorandums	3- I
	-Agency for Toxic Substances and Disease Registry Risk Assessment Information	3-K
	-OSC Report	3-M

* Portions of these OSC Report Appendices may contain confidential business information or enforcement-sensitive information and must be reviewed by the Office of Regional Counsel prior to release to the public.

Note that certain files for this site are maintained elsewhere by the Emergency Response Branch. These appendices are those files maintained by the OSC during the removal action.

EXECUTIVE SUMMARY OF THE REMOVAL ACTIVITY

SITE: 76th and Parnell Soil Removal Site

LOCATION: Chicago, Cook County, Illinois

PROJECT DATES: 10 March 2003 to 25 April 2003

INCIDENT DESCRIPTION: The 76th and Parnell Soil Removal Site (Site) is located between 519 West 76th Street and 555 West 76th Street near the intersection of West 76th Street and Parnell Street in Chicago, Cook County, Illinois (latitude 41° 45' 28" N, longitude 87° 38' 15" W). Historical records indicate that the Site was occupied by various industrial and warehousing tenants for more than 100 years. The current owner of the Site is listed as the City of Chicago. The Site is currently vacant and is split into two parcels; a northern parcel and a southern parcel. Following the discovery of several 55-gallon drums within a wooded area of the southern parcel, the U.S. EPA was contacted. Following the completion of site assessments completed by the U.S. EPA on 6 August 2002 and 18 December 2002, the presence of uncontrolled hazardous substances constituting a threat to public health and the environment was confirmed. Additional site assessment activities have been completed by the City of Chicago Department of Environment. The Site is not on the National Priorities List. No PRP was found to be financially viable to undertake a full cleanup of the Site.

ACTIONS: The presence of uncontrolled hazardous substances at the Site constituted an immediate threat to public health and the environment. The Site's proximity to residential properties and commercial properties required that this action be classified as a time critical removal. A Time Critical Removal Action was approved to abate the threats to human health and the environment posed by the uncontrolled concentrations of lead present in site soils. U.S. EPA and the START and ERRS contractors mobilized to the Site on 10 March 2003. A command post was established using portable office trailers, excavation equipment was brought onto the Site, and site security was established. Excavation of contaminated soil began on 11 March 2003, and excavated soil was stockpiled on-site. On 12 and 13 March 2003, waste characterization sampling was completed for

each of the five identified excavation areas. and excavated soil was segregated into hazardous and non-hazardous waste streams. On 27 March 2003, transportation and disposal of contaminated soil was initiated. From 31 March through 9 April 2003, a stike by the Operator's Union Local 150 disrupted off-site transportation and disposal.

Confirmation sampling activities were initiated on 19 March 2003. Seventy confirmation samples were collected to demonstrate the effectiveness of the removal activities. Analytical results indicated that all but five confirmation samples were below the cleanup objective. For locations that exceeded the cleanup objective, further removal activities were completed and additional confirmation samples were collected. Following the completion of confirmation sampling of the excavated areas, U.S. EPA and contractors demobilized from the Site on 25 April 2003. A total of 2,288 tons of soil were removed from the Site, of which approximately 990 tons were removed for treatment/disposal as characteristically hazardous waste, and approximately 1,298 tons were removed for disposal as non-hazardous special waste.

Following the completion of the removal activities, the City of Chicago accepted responsibility for backfilling the excavated areas. The City of Chicago is completing additional site remediation activities through the Illinois EPA Site Remediation Program.

Michael Harris, On-Scene Coordinator
U.S. EPA, Region V
Chicago, Illinois

I. SUMMARY OF EVENTS

A. Site Conditions and Background

1. Initial situation

The 76th and Parnell Soil Removal Site (Site), is a vacant 7-acre lot formerly occupied by various tenants engaged in industrial and warehousing operations. Historical records obtained for the period from 1897 until 2002 (CTE, 2002) indicate that former tenants include Amer Processing Co. Metals and Finishing, Macco Products Co., Industrial Cleaners, Lamar Metal Finishers, Windsor Sheet Metal Works, C & C Metal Finishing, Staver and Abbott Manufacturing Company, Staver Carriage Company, and the Studebaker Corporation (CTE, 2002). The former tenant Staver and Abbott Manufacturing Company operated an asbestos covered boiler room, an incinerator room, Staver Carriage Company operated a gear painting, motor assembly, and machining facilities, and the Studebaker Corporation operated a gasoline tank of unknown size (CTE, 2002). The current owner of the Site is listed as the City of Chicago. The Site is not listed on the National Priorities List (NPL).

The Site is located between 519 West 76th Street and 555 West 76th Street near the intersection of West 76th Street and Parnell Street in Chicago, Cook County, Illinois (latitude 41^{0}45' 28" N, longitude 87^{0}38' 15" W). The Site is split into two parcels; a northern parcel and a southern parcel. The Site is irregularly-shaped, bounded to the north by residential and vacant properties on West 76th Street; to the east by an elevated Metra train track, immediately followed by residential properties; to the south by residential and commercial properties along West 78th Street; and to the west by a set of elevated Chicago & Western Illinois Railroad and Lyle Park. A base map of the Site is shown in Figure 1-1. According to the Region 5 Superfund Environmental Justice

Analysis, the residential population nearest to the Site resides in census tract #6912, block group #4 and has a total population of 1,777. The Site constitutes an environmental justice priority based on the demographic conditions of the nearby community (U.S. EPA, 2003).

On 6 August 2002, personnel from Weston Solutions, Inc. (WESTON), under the Superfund Technical Assessment and Response Team (START) contract and the U.S. EPA conducted an emergency Site Assessment based upon reports from the City of Chicago of several 55-gallon drums at the Site. Four drum samples were collected and five soil surface samples were collected from soil surrounding the drums. Analysis of the samples did not indicate the presence of any hazardous substances within the drums or in the surrounding soil.

A second Site Assessment was conducted from 18 through 20 December 2002. Analysis of soil samples collected during this Site Assessment indicated the presence of concentrations of toxicity characteristic leaching procedure (TCLP) lead above the criteria level for the characteristic of toxicity for hazardous waste (40 Code of Federal Regulations [CFR] Part 261, 2001) of 5.0 milligrams per liter (mg/L) (CFR. The source of the characteristically hazardous concentrations of lead could not be linked to any specific release at the Site and is likely related to the Site's history as an industrial property. Due to the presence of uncontrolled hazardous substances at the Site and the Site's proximity to residential and commercial properties, the U.S. EPA prepared an Action Memorandum proposing to complete a Time Critical Removal Action at the Site.

Based upon the results of the results of the Site Assessment, an estimate of 170 cubic yards (yd^3) of contaminated soil was developed (WESTON, 2003A, and U.S. EPA, 2003). Additionally, following the completion of additional investigations in the northern parcel of the Site by the City of

Chicago Department of Environment (CDOE), an additional 1,557 yd^3 of TCLP lead contaminated soil was estimated to be present at the Site (CDOE, 2003a).

Due to the unavailability of state or local funds to respond to these threats, and the presence of uncontrolled hazardous substances at the Site, the U.S. EPA proposed to complete a Time Critical Removal Action. Pursuant to the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) at 40 CFR 300.415(b)(2)(I), (iii), and (v) U.S EPA, 2003) . U.S. EPA deemed that conditions at the Site posed threats to human health and the environment and had the potential for off-site migration of contamination. A removal action was approved under TDD S05-0303-007 dated 19 March 2003.

2. Location of hazardous substance(s)

Based on the analytical data from the site assessments completed by both the U.S. EPA and the CDOE, areas of the site were identified as contaminated above the regulatory limits for the characteristic of toxicity for hazardous waste due to lead contamination. Additionally, soil samples taken during these site assessment were identified that contained elevated concentrations of total lead (above 1,600 milligrams per kilogram [mg/kg]) for which TCLP lead analysis was not performed. As a conservative measure, the sampling locations at which these levels were found were included in the scope of work for the removal action (SB-116 [2,870 mg/kg] and CTE soil borings SB42BF [9,000 mg/kg] and SB42BG [3,500 mg/kg]). The locations of the hazardous substances are illustrated on Figure 1-2.

Soil containing concentrations of TCLP lead that are considered characteristically hazardous cause a concern to the surrounding community due to significant health risks associated with exposure to lead. The effects

of lead exposure are more severe for young children, pregnant women, and elderly members of the population; and include impacts to fetal development, decreased mental ability, and a reduced growth rate for young children (U.S. EPA, 2003). Lead exposure also has harmful health risks for the adult members of the population, including increased blood pressure, anemia, decreased reaction time, memory, and damage to the male reproductive system. Lead is also considered a probable human carcinogen. The public could be exposed to lead contaminated soil through several mechanisms. Access to the Site is not controlled, and, despite the presence of a perimeter fence, evidence of trespassing was observed during the walk-through portion of the CDOE Phase I ESA (CTE, 2002). Members of the local population, especially young children who may play at the Site, could be exposed to lead contaminated soil. Additionally, since contaminant concentrations were present at the surface of the Site, severe weather such as heavy rain, flooding, and high winds could cause migration of the contaminants offsite and create a significant health risk to the public.

3. Cause of release or discharge

The U.S. EPA was contacted by the CDOE regarding the potential hazards at the Site. Subsequent Site Assessments confirmed the presence of contaminated soil and prompted the start of removal activities. The Site was used by several manufacturing, painting, and metal finishing operations through its history. No specific release incident at the Site has been reported and the cause of the release is likely associated with the Site's history as an industrial property.

4. Efforts to locate or obtain response by responsible parties

No financially viable PRPs have been identified by U.S. EPA; however, the enforcement investigation is ongoing.

B. Organization of Response

On 10 March 2003, U.S. EPA On-Scene Coordinator (OSC), START, and Emergency Rapid Response Service (ERRS) initiated a removal action to address hazardous substances at the 76th and Parnell Site, consistent with the U.S. EPA Action Memorandum. Table 1-1 summarizes the organization of the response.

Table 1-1
Organization of the Response
76th and Parnell Site
Chicago, Cook County, Illinois

Agency or Party Involved	Contact	Role
U.S. EPA Region 5 Emergency Response Branch 77 W. Jackson Blvd. Chicago, Illinois 60604 (312) 886-0760	Michael Harris	Federal OSC responsible for overall oversight and success of the project.
Weston Solutions, Inc. 70 W. Madison St., Ste. 1990 Chicago, Illinois 60602 (312) 424-3300	James Molholm	START contractor responsible for providing U.S. EPA with technical assistance, administrative support, sampling, site documentation, site safety, and draft report preparation.
Earth Tech, Inc. 7870 Villa Park Drive Suite 400 Richmond, Virginia 23228 (804) 515-8300	Dave Bofinger	Senior Response Manager responsible for direction of ERRS. Provided personnel and equipment necessary for removal and coordinated shipment and disposal of contaminated soil.

C. Chronological Narrative of Removal Actions

1. Threat abatement actions taken

Conditions at the Site met the criteria of the NCP, 40 CFR 300.415(b)(2) for a removal action. The U.S. EPA mobilized the START and ERRS contractors on 10 March 2003. From10 March through 12 March 2003, the scope of work focused on general preparation for the removal action, which included establishing a command post, arranging site security, marking the excavation areas of the Site, and collecting waste characterization samples.

The command post was established in the northern section of the Site. Phone lines were established for the command post and several loads of gravel were spread on the ground outside of the trailers to control the mud. A portable generator was brought onsite to provide power for the command post. Site security was enhanced by installing a lock on the site entrance gate, posting warning signs at the entrance, and arranging for overnight security personnel to guard the Site. Since several open holes and other trip hazards were present throughout the Site, these hazards were identified using warning tape posted around the hazards.

ERRS conducted waste characterization sampling on 12 and 13 March 2003. Initially, five excavation areas (Area A through Area E) were identified based on the results of the previously completed Site Assessments by WESTON (WESTON, 2003a) and by CTE (CTE, 2003) and composite waste characterization samples were obtained from each of the soil areas. Based on the results of the sampling, the staged soil from one excavation area (Area E) was characterized as hazardous. The staged soil from the remaining excavation areas were characterized as non-hazardous.

While awaiting the results of the waste characterization analysis, ERRS began to excavate the identified excavation areas. The excavated soil was staged onsite, on top of a polyethylene liner. At the end of each day's excavation activities, the stockpiled soil, as well as the open excavations, were covered with a polyethylene liner to prevent the migration of contaminated dust.

The excavation activities were guided by field-screening activities completed by START. Field-screening was completed using a portable Niton XL-700 series model X-ray fluorescence (XRF) analyzer in order to determine if the lead concentrations exceeding the 1600 part per million (ppm) screening level were still present within samples collected along the excavation sidewalls and floors. The XRF analyzer screening results, as well as the geographic locations of the samples, are contained within the site file and are available for review.

Following the completion of removal activities at each of the excavation areas, confirmation samples were collected to demonstrate the completion of the removal action goals. Analytical results indicated that lead levels in all but five confirmation samples were below the 5.0 mg/L cleanup objective. For confirmation sampling locations at which lead levels exceeded the cleanup objective, further removal activities were conducted and additional confirmation samples were collected. The results of the subsequent confirmation samples demonstrated that cleanup objectives were met in all sampling locations. Analytical results are summarized in Table A-1 and copies of the analytical laboratory reports are provided in Attachment 1. The extent of the excavated areas, and confirmation sampling locations, are illustrated on Figure 1-3.

Confirmation samples were used to demonstrate the success of the removal activities and to verify the accuracy of the field-screening using the XRF

analyzer. All of the confirmation samples collected were also field-screened using the procedure established in the Field Sampling and Analysis Plan (WESTON, 2003b). According to U.S. EPA Method 6200, the correlation coefficient between the XRF data and the laboratory data should be above 0.7 for the data to be considered screening level data (U.S. EPA, 1998). A correlation coefficient of 0.74 was obtained for this project. A summary of the XRF analyzer screening data and confirmed laboratory results, as well as the regression analysis, is provided in Attachment 2. These results indicate that field-screening using the XRF analyzer provided the OSC with a reliable estimate of the total lead concentration within each sample.

On 27 March 2003, transportation and disposal of contaminated soil was initiated. Approximately 2,288 tons of soil were removed from the Site. Envirite of Illinois, Inc. (Envirite) of Harvey, Illinois and Allied Waste of Brook, Indiana provided the ERRS crew with transportation and disposal services for hazardous and non-hazardous waste, respectively.

Removal activities were completed on 25 April 2003. Although the Action Memorandum initially identified that the U.S. EPA would backfill and vegetate the Site, in a letter dated 15 April 2003, the CDOE accepted responsibility to backfill the excavated areas using an approach consistent with the Illinois Environmental Protection Agency (IEPA) Site Remediation Program (CDOE, 2003b). Therefore, the backfilling and vegetation of the excavated areas proposed in the Action Memorandum was not completed by the U.S. EPA.

2. Treatment, disposal, or alternative-technology approaches pursued

Based on the results of the waste characterization sampling, the excavated soil was segregated into hazardous and non-hazardous waste streams. These waste streams were transported off site to Envirite (hazardous waste) and

Allied Waste (non-hazardous special waste) for treatment and disposal in accordance with U.S. EPA's Off-Site Rule (40 CFR 300.440). The disposition and quantities of the wastes, as well as the method of disposal and the location of the disposal facility, are summarized in Table 1-3. The waste disposal summary is provided in Attachment 3. The original manifests and bills of lading are contained in the Site files.

Table 1-2
Waste Materials and Disposal Summary
76th and Parnell Site
Chicago, Cook County, Illinois

Material	Amount	Method	Location
Hazardous Waste Solid (D008)	990 Tons	Treatment/Landfill	Envirite of Illinois, Inc. Harvey, Illinois
Non-Hazardous Special Waste	1,298 Tons	Landfill	Allied Waste Brook, Indiana

3. Public information and community relations activities

The City of Chicago, through the CDOE, was informed of removal action progress throughout the duration of the project and was included in the distribution of the POLREPS completed on 14 March 2003 and 25 April 2003.

D. Resources Committed

All resources for the removal activities were provided by the U.S. EPA. Removal activities commenced on 10 March 2003 and confirmation sampling activities were completed from 20 March 2003 through 22 April 2003. All removal activities were completed on 25 April 2003. An estimation of the total costs is summarized in Table

1-4. Any indication of specific costs incurred at the Site is only an approximation, subject to audit and finalization by the U.S. EPA. The OSC Report is not meant to be a final reconciliation of the costs associated with a particular site.

Table 1-3

Removal Project Estimated Total Cost

76th and Parnell Site

Chicago, Cook County, Illinois

EXTRAMURAL COSTS	
Total Cleanup Contractor Costs - Earth Tech (1)	$ 290,000.00
Total START Contractor - WESTON (2)	$ 33,171.05
EXTRAMURAL SUBTOTAL	$ 323,171.05
INTRAMURAL COSTS	
U.S. EPA - Direct Costs (3)	$ XXXXXX
U.S. EPA - Indirect Costs	$ XXXXXX
U.S. EPA - Other	$ XXXXX
INTRAMURAL SUBTOTAL	$ XXXXXX
ESTIMATED TOTAL PROJECT COSTS	$ 323,171.05
PROJECT CEILING	$ 463,773

(1) Source: U.S. EPA Hazardous Substance Response Fund Contractor Cost/Receiving Report (EPA Form 1900-55)

(2) Source: WESTON START cost documentation

(3) Source: U.S. EPA cost documentation

II. EFFECTIVENESS OF REMOVAL ACTIVITIES

A. Actions Taken by PRPs

No potentially responsible party (PRP) was identified prior to the approval of the Action Memorandum. An ongoing enforcement investigation is being conducted by the U.S. EPA.

B. Actions Taken by State and Local Agencies

The Site came to the U.S. EPA Emergency Response Branch's (ERB) attention through the CDOE. On 27 June 2002, the CDOE contracted Effluent Technology, Inc to remove one drum that contained mineral spirits (RCRA Hazardous Class D001). In July of 2002, the CDOE completed a Phase I Environmental Site Assessment (ESA) detailing the potential environmental conditions at the Site, as well as providing a summary of the Site's land use and ownership history.

Prior to the completion of the U.S. EPA's December 2002 Site Assessment, the CDOE cleared and grubbed the heavily wooded portions of the southern parcel. Additionally, the CDOE provided the U.S. EPA with analytical results that were obtained from previously completed Site Assessments (CTE, 2003) CDOE investigations. The analytical results were used to identify and delimit the areas of the Site that contained hazardous substances.

An initial meeting was held on 10 March 2003 at the Site between CDOE, U.S. EPA, and the START and ERRS contractors to discuss the planned activities for the removal action.

On 15 April 2003, the CDOE accepted responsibility to backfill the excavation areas backfilling using an approach consistent with the IEPA Site Remediation Program.

The Chicago Utility Alert Network (DIGGER) was contacted in order to obtain utility clearances for the site. DIGGER contacted local utility companies and provided the companies with Site information so that the locations of onsite and nearby subsurface utilities could be marked.

C. Actions Taken by Federal Agencies and Special Teams

The U.S. EPA provided monetary and personnel resources and the overall response organization and oversight during the removal activities.

D. Actions Taken by Contractors, Private Groups, and Volunteers

The U.S. EPA ERRS contractor conducted the removal activities at Site. In addition to providing the materials and labor for the excavation activities, ERRS coordinated the transportation and disposal of contaminated soil. Other contractors were used in various capacities at the site through the ERRS contractor; including site security, utilities, and laboratory services.

The U.S. EPA START contractor provided assistance by completing analysis of field-screening samples, maintenance of the site health and safety plan, documentation of on-site activities, air monitoring within the work areas, tracking of manifested and non-manifested waste shipments, operation of the global position system, and assistance with CERCLA paperwork.

III. DIFFICULTIES ENCOUNTERED

A. Items That Affected the Response

From 31 March through 9 April 2003, the transportation and disposal of contaminated soil was disrupted by a strike by the Operator's Union Local 150. The transportation and disposal subcontractors honored the strike and refused to cross the Union's picket line. During the time of this strike, removal activities continued, including the excavation and staging of contaminated soil, field screening using the XRF analyzer, and collection of confirmation samples. On 10 April 2003 the strike was resolved, and transportation and disposal activities continued without any further incidents.

B. Issues of Intergovernmental Coordination

Information collected from the Site Assessments completed by the CDOE and its consultant provided the OSC with useful information regarding the location of contaminated soil at the Site. The CDOE sampled soil and identified soil sampling locations at the Site with a system of pin flags. The U.S. EPA and START then used a GPS unit to record the geographic locations of these sampling locations and project these locations onto the State Plane IL Nad 83 coordinate system. Once the CDOE and U.S. EPA soil boring locations were projected onto the same coordinate system, maps were generated using both CDOE and U.S. EPA soil sampling locations for use in the removal action.

C. Difficulties Interpreting, Complying with, or Implementing Policies and Regulations

No difficulties were noted during the project.

IV. RECOMMENDATION

A. Means to Prevent a Recurrence of the Discharge or Release

The Site is currently owned by the City of Chicago and is planned for development as residential properties. The CDOE is planning to complete remedial and corrective action activities under the guidance of the IEPA Site Remediation Program. Corrective action activities will include the construction of engineered barriers over portions of the site that contain contamination above the Illinois remediation objectives (non-hazardous contamination). Based on the planned land use of this Site, it is not anticipated that a recurrence of the release will occur.

B. Means to Improve Removal Activities

Investigations completed on the behalf of the CDOE used a grid system of pin flags across the site to identify soil sampling locations. The U.S. EPA and START used a GPS unit to mark soil sampling locations. Since the locations of the CDOE and U.S. EPA soil sampling locations were not collected using the same methods, additional effort was expended to collect GPS data for the CDOE soil sampling locations. The use of similar systems to identify soil sampling locations would improve the transition of a project from a local governmental agency to the U.S. EPA.

C. Recommendations for New Policy or Regulations, and Changes in Current Regulations and Response Plans

None.

V. REFERENCES

City of Chicago Department of Environment (CDOE), Telephone Conversation with Annalisa Ahumada, 16 January 2003a.

CDOE, Letter from Ms. Annalisa Ahumada, 15 April 2003b.

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CTE, Comprehensive Site Investigation Report - 519-555 West 76th Street, Chicago, Illinois 60609, 31 July 2002; CTE, Comprehensive Site Investigation Report Addendum 1 76th and Parnell (North Parcel) 519-555 West 76th Street, Chicago, Illinois 60609, 4 March 2003.

Title 40 - United States Code of Federal Regulations (CFR) - Protection of Environment, Part 261 Identification and Listing of Hazardous Waste, 2001.

United States Environmental Protection Agency (U.S. EPA), Action Memorandum - Request for Approval of Funding for a Time Critical Removal at the 76th and Parnell Site, Chicago, Cook County, Illinois, 7 March 2003.

U.S. EPA, Method 6200 - Field Portable X-Ray Fluorescence Spectrometry for the Determination of Elemental Concentrations in Soil and Sediment, 1 May 1998.

Weston Solutions, Inc (WESTON), Site Assessment and Extent of Contamination Report for the 76th and Parnell Site, Chicago, Cook County, Illinois, 5 February 2003a.

WESTON, Removal Program Field Sampling and Analysis Plan - 76th and Parnell Site, Chicago, Cook County, Illinois, 1 April 2003b.

FIGURES

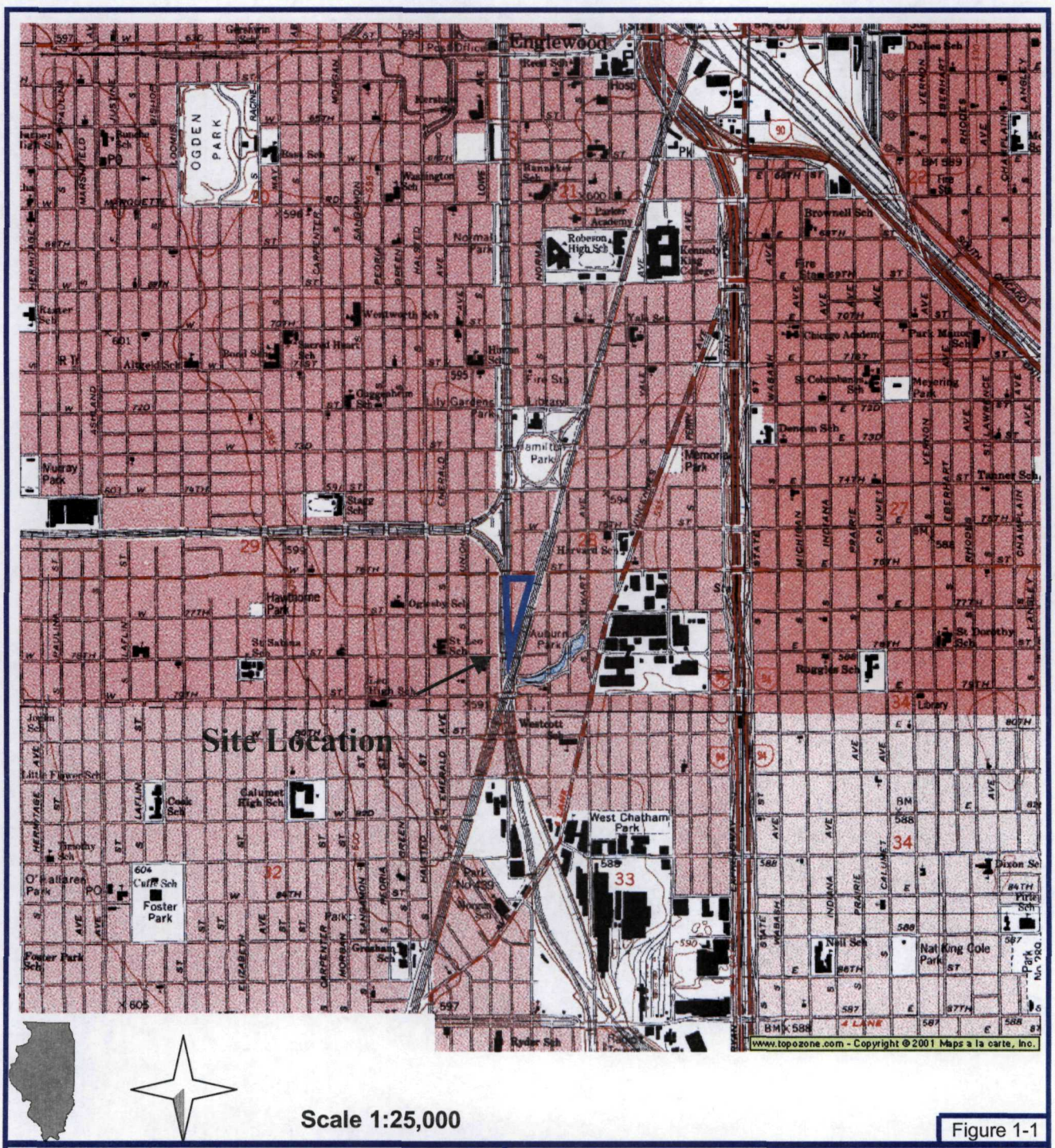


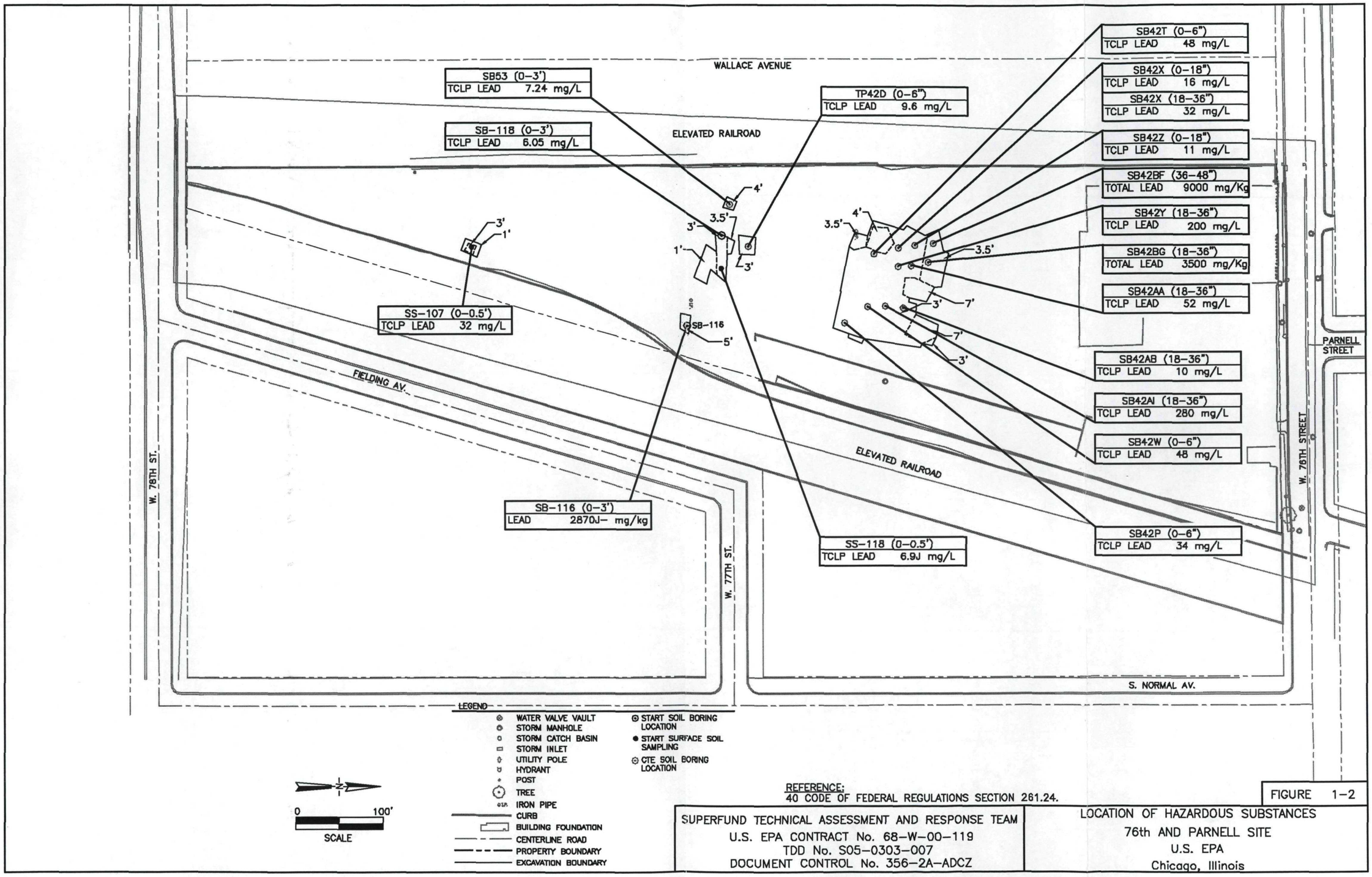
Figure 1-1

Superfund Technical Assessment and Response Team.
U.S. EPA Contract No. 68-W-00-119
TDD No. S05-0303-007
Document Control No. 356-2A-ADFG

TOPOGRAPHICAL SITE LOCATION MAP

76th AND PARNELL SITE

Chicago, Cook County, Illinois



REFERENCE:
40 CODE OF FEDERAL REGULATIONS SECTION 261.24.

FIGURE 1-2

SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM
U.S. EPA CONTRACT No. 68-W-00-119
TDD No. S05-0303-007
DOCUMENT CONTROL No. 356-2A-ADCZ

LOCATION OF HAZARDOUS SUBSTANCES
76th AND PARNELL SITE
U.S. EPA
Chicago, Illinois

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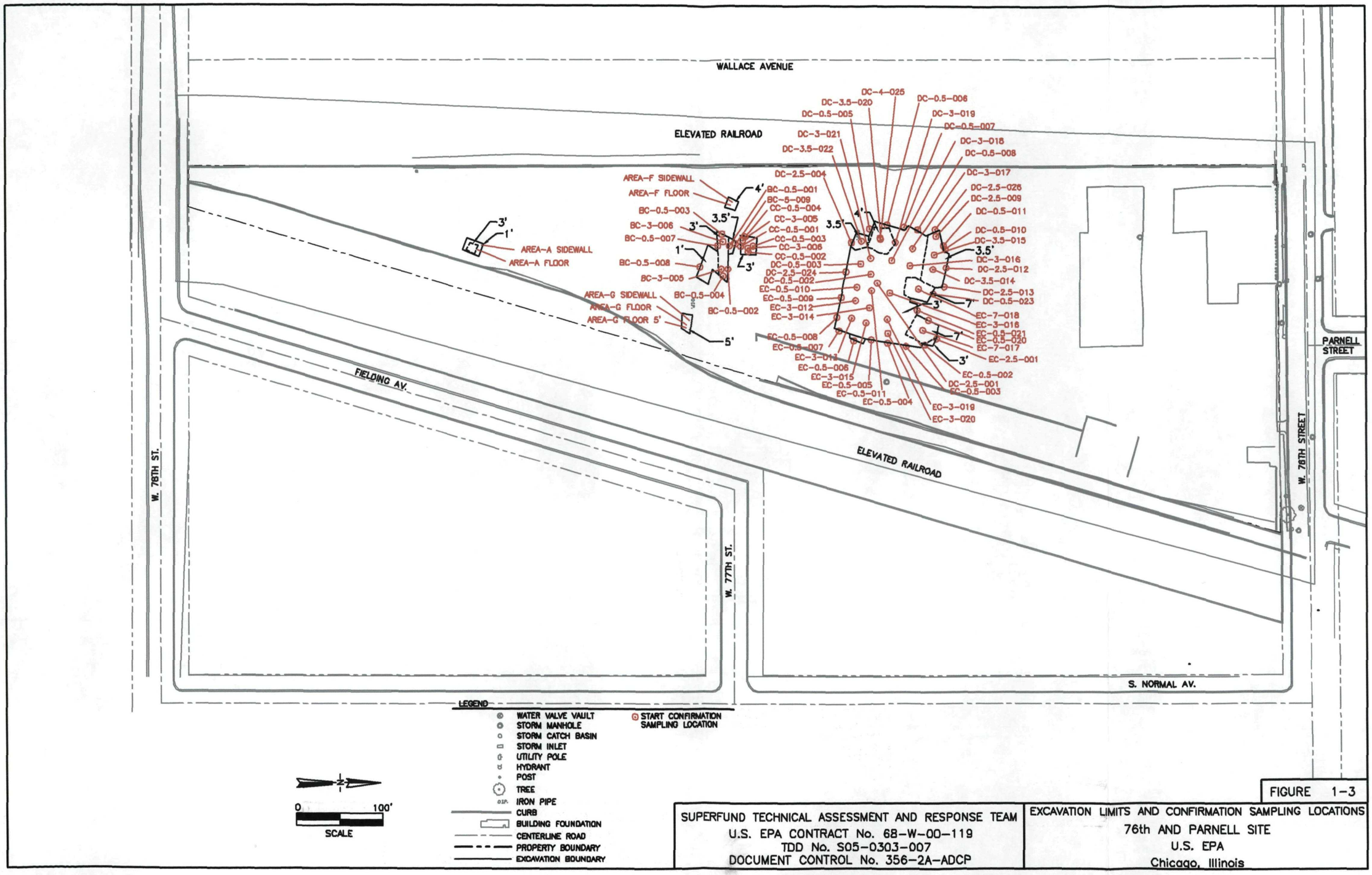

FIGURE 1-3

SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM
U.S. EPA CONTRACT No. 68-W-00-119
TDD No. S05-0303-007
DOCUMENT CONTROL No. 356-2A-ADCP

EXCAVATION LIMITS AND CONFIRMATION SAMPLING LOCATIONS
76th AND PARNELL SITE
U.S. EPA
Chicago, Illinois

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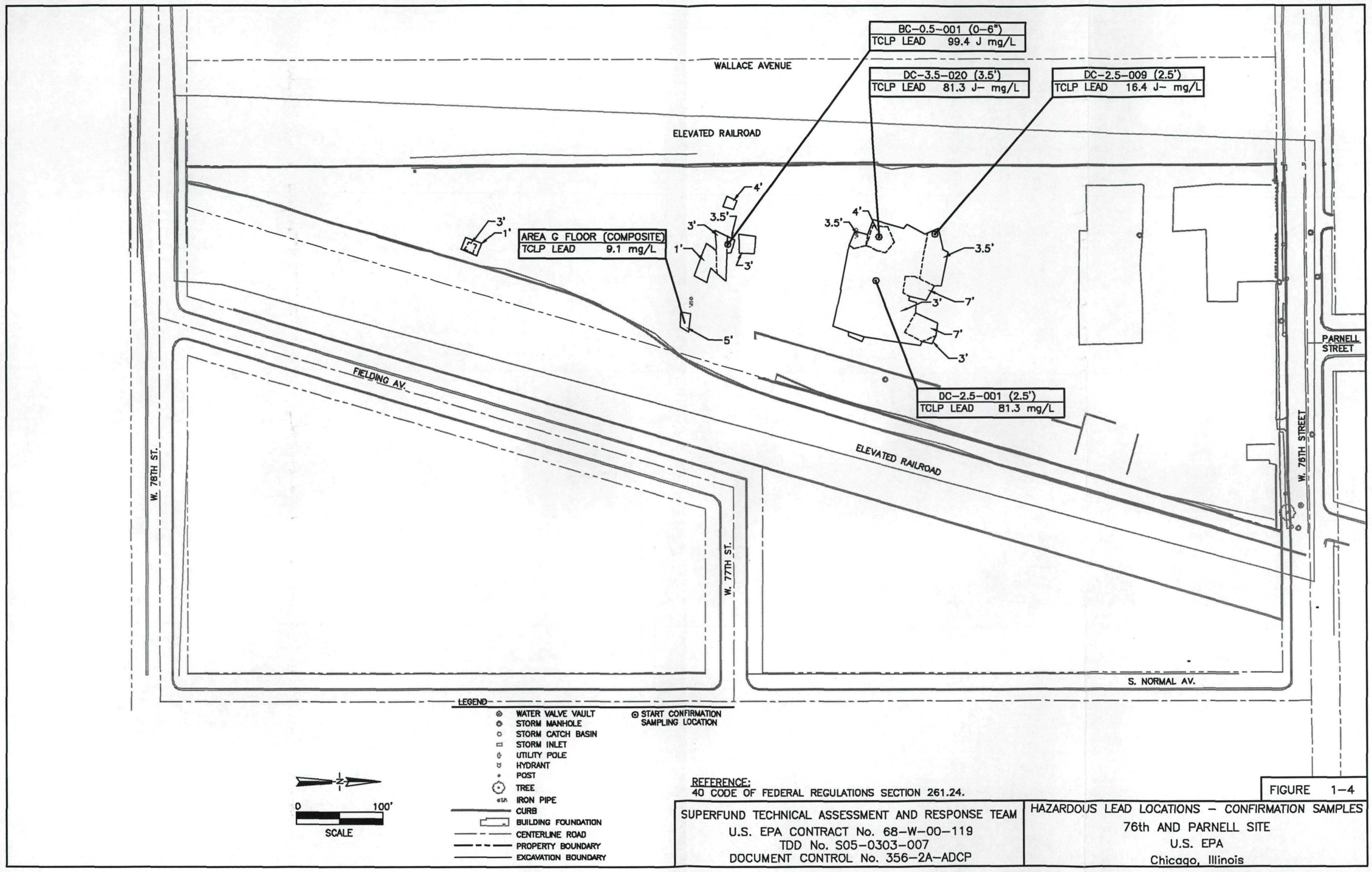

REFERENCE:
40 CODE OF FEDERAL REGULATIONS SECTION 261.24.

FIGURE 1-4

SUPERFUND TECHNICAL ASSESSMENT AND RESPONSE TEAM
U.S. EPA CONTRACT No. 68-W-00-119
TDD No. S05-0303-007
DOCUMENT CONTROL No. 356-2A-ADCP

HAZARDOUS LEAD LOCATIONS - CONFIRMATION SAMPLES
76th AND PARNELL SITE
U.S. EPA
Chicago, Illinois

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